

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA)	CRIMINAL NO. 05-888 (FLW)
)	<i>04</i>
v.)	
)	
MELISSA RAMLAKHAN,)	18 U.S.C. § 371, 1956(h)
a/k/a "India")	18 U.S.C. § 982(a)(1)
)	

SUPERSEDING INFORMATION

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

COUNT 1
(Conspiracy to Transport Individuals in Furtherance of Prostitution)

1. From in or about January 1999 to in or about December 2005, in the District of New Jersey, and elsewhere, defendant

MELISSA RAMLAKHAN,
a/k/a "India,"

did knowingly conspire and agree with co-conspirators Matthew Thompkins, Demetrius Lemus, Noel Lopez, Emily Collins-Koslosky, Jacqueline Collins-Koslosky, Anna Argyroudis, and Kemyra Jemerson, and with others to transport individuals in interstate and foreign commerce, with intent that such individuals engage in prostitution, contrary to Title 18, United States Code, Section 2421; persuade, induce, entice, and coerce individuals to travel in interstate and foreign commerce, to engage in prostitution, contrary to Title 18, United States Code, Section 2422(a).

Object of the Conspiracy

2. It was the object of the conspiracy to recruit and transport women and others

between various cities, including Atlantic City, New Jersey, Bronx, New York, Boston, Massachusetts and Las Vegas, Nevada, to engage in prostitution for the financial benefit of defendant **Melissa Ramlakhan** and her co-conspirators.

Manner and Means of the Conspiracy

3. It was part of the conspiracy that defendant **Melissa Ramlakhan** and her co-conspirators managed a large-scale prostitution ring that operated in several states including, but not limited to, New Jersey, New York, Nevada, Pennsylvania, Florida, Massachusetts and the District of Columbia.

4. It was further part of the conspiracy that defendant **Melissa Ramlakhan** and her co-conspirators recruited and transported women and others between several states for the purpose of engaging in prostitution.

5. As a result of their actions in furtherance of the conspiracy, defendant **Melissa Ramlakhan** and her co-conspirators derived substantial income from the prostitution of women and others.

Overt Acts

In furtherance of the conspiracy, and to effect its unlawful object, defendant **Melissa Ramlakhan** and her co-conspirators committed and caused to be committed the following overt acts in the District of New Jersey and elsewhere:

6. In or about 2002, defendant **Melissa Ramlakhan** and co-conspirator Matthew Thompkins traveled from Bronx, New York to Las Vegas, Nevada and established a business called Upscale Exotics, which was a prostitution outcall service.

7. In or about 2002, defendant **Melissa Ramlakhan** recruited J.H., to work as a

prostitute for co-conspirator Matthew Thompkins.

8. In or about November 2002, co-conspirator Matthew Thompkins instructed M.D. to travel to Las Vegas, Nevada to work as a prostitute.

9. Between in or about 2003 and 2005, co-conspirators Emily Collins-Koslosky, Jacqueline Collins-Koslosky, Kemyra Jemerson and others traveled between Bronx, New York and Las Vegas, Nevada to work as prostitutes for "dates" arranged through Upscale Exotics.

10. During 2005, defendant **Melissa Ramlakhan** and J.H. traveled from Bronx, New York to Atlantic City, New Jersey and worked as prostitutes for co-conspirator Matthew Thompkins.

In violation of Title 18, United States Code, Section 371.

COUNT 2
(Conspiracy to Engage in Money Laundering)

1. Paragraphs 2 through 5 of Count 1 are incorporated by reference and realleged as if fully set forth herein.
2. From in or about January 1999 to in or about December 2005, in Atlantic County, in the District of New Jersey and elsewhere, the defendant

MELISSA RAMLAKHAN,
a/k/a "India,"

and others, knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, and (1) with the intent to promote the carrying on of specified unlawful activity, namely, conspiracy to transport individuals and minors in furtherance of prostitution, contrary to Title 18, United States Code, Sections 2421 and 2423, and (2) knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of such specified unlawful activity, did knowingly and willfully conspire and agree with co-conspirators Matthew Thompkins, Emily Collins-Koslosky, Jacqueline Collins-Koslosky, Anna Argyroudis, and Kemyra Jemerson and others to conduct and attempt to conduct such a financial transaction which in fact involved the proceeds of such specified unlawful activity, contrary to Title 18, United States Code, Sections 1956(a)(1)(A)(i) and (a)(1)(B)(i).

In violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATION

1. Upon conviction of the offense alleged in Count 2 of this Superseding Information, defendant **MELISSA RAMLAKHAN**, a/k/a "India," shall forfeit to the United States pursuant to 18 U.S.C. § 982(a)(1), any property constituting and traceable to gross profits and other proceeds obtained from said violation, and any property used and intended to be used to commit and to promote the commission of said violation, including but not limited to the following:

A. *Real Property*: All that lot and parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements located at and more particularly described as follows:

- (1) New York: 16 Tall Tulip Lane, Yonkers, New York; 10710-2326; and
- (2) New Jersey: 719 2nd Avenue, Galloway Township, New Jersey 08205;

B. *Conveyance*: All motor vehicles as more particularly described as follows:

- (1) 2003 Land Rover RRV, VIN# SALMB11423A105441; and
- (2) 2000 Mercedes Benz 500, VIN# WDBPJ75J4YA007429.

C. *Bank Account*: All United States currency funds or other monetary instruments credited to account number 0000873715 in the name of defendants **MATTHEW THOMPKINS** and **MELISSA RAMLAKHAN** located at the Municipal Credit Union, 2 Lafayette Street, New York, New York and account number 091-0903300-65 in the name of **Matthew D. Thompkins** and **Melissa Ramlakhan**, located at JP Chase Bank, 1 Chase Manhattan Plaza, New York, New York.

FORFEITURE ALLEGATION

1. Upon conviction of the offense alleged in Count 2 of this Superseding Information, defendant **MELISSA RAMLAKHAN**, a/k/a "India," shall forfeit to the United States pursuant to 18 U.S.C. § 982(a)(1), any property constituting and traceable to gross profits and other proceeds obtained from said violation, and any property used and intended to be used to commit and to promote the commission of said violation, including but not limited to the following:

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C. *Bank Account*: All United States currency funds or other monetary instruments credited to account number 0000873715 in the name of defendants MATTHEW THOMPKINS and MELISSA RAMLAKHAN located at the Municipal Credit Union, 2 Lafayette Street, New York, New York and account number 091-0903300-65 in the name of Matthew D. Thompkins and Melissa Ramlakhan, located at JP Chase Bank, 1 Chase Manhattan Plaza, New York, New York.


CHRISTOPHER J. CHRISTIE
United States Attorney

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SUPERSEDING INFORMATION

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18 U.S.C. § 1956 (h)

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